

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re

CHRISTOPHER ROY AND ALEXIA J. ROY,  
Debtor(s).

Case No. 10-15118-MLB

Chapter 7

*EX PARTE* MOTION TO REOPEN  
CASE AND VACATE DISCHARGE  
AS TO WELLS FARGO DEALER  
SERVICES FOR THE PURPOSE OF  
ALLOWING A REAFFIRMATION

COME NOW Debtors Christopher Roy and Alexia J. Roy ("Debtors"), by and through their attorneys, Seattle Debt Law LLC, and move this Court for an order reopening their Chapter 7 case and vacating the discharge as to Creditor Wells Fargo Dealer Services to allow the Debtors an opportunity to approve a reaffirmation of their vehicle.

As explained in the Declaration filed concurrently herewith, Debtors' Chapter 7 Case was closed with discharge on August 24, 2010. In order to correct this problem, the Debtors respectfully request that this Court reopen their Chapter 7 case and vacate their discharge order as to Creditor Wells Fargo Dealer Services for the sole purpose of filing a reaffirmation agreement to reaffirm their vehicle.

1 DATED this 1st day of November, 2010.

2 SEATTLE DEBT LAW, LLC

3  
4 By: /s/ Christina Latta Henry  
5 Christina Latta Henry, WSBA #31273  
6 Attorneys for Debtors

7 **PROOF OF SERVICE**

8 I, Theresa A. Shim, under penalty of perjury, declare that on the dates indicated below, I  
9 caused a copy of the Debtor's *Ex Parte* Motion to Reopen Case and Vacate Discharge,  
10 Declaration of Counsel in Support of Same, and Proposed Order Granting Same to be served on  
11 the parties listed below via ECF on November 1, 2010:

12 Ronald G. Brown [rgblaw@nmlink.com](mailto:rgblaw@nmlink.com); [rgbrown@ecf.epiqsystems.com](mailto:rgbrown@ecf.epiqsystems.com);

13 US Trustee [USTPRegion18.SE.ECF@usdoj.gov](mailto:USTPRegion18.SE.ECF@usdoj.gov)

14 I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE  
15 OF WASHINGTON THAT THE FOREGOING STATEMENT IS BOTH TRUE AND  
16  
17 CORRECT.

18 Executed this 1st day of November, 2010 at Seattle, Washington.

19 /s/ Theresa A. Shim  
20 Theresa A. Shim